

Response to Comments

Comment Deadline: March 28, 2019 by 5:00 p.m.

Tentative National Pollutant Discharge Elimination System (NPDES) and Waste Discharge Requirements (WDRs) Order R7-2019-0003, California Department of Corrections, Centinela Wastewater Treatment Plant

Comment Letter #	Date	Commenter	Affiliation
Letter 1	3/28/2019	Pascal Mues	USEPA – Environmental Engineer

Changes proposed in response to comments made on 3/28/19 will be incorporated into the tentative WDRs as shown in the errata sheet prepared on 4/9/19.

Comment #	Location in the WDRs	Comment	Response
1	Attachment F. Fact Sheet, IV. Rationale for Effluent Limitations and Discharge Specifications, C. Water Quality-Based Effluent Limitations (WQBELs)	In the Fact Sheet, section IV.C (WQBELs) appropriately notes that the NPDES regulations require effluent limits to control “all pollutants which...have the reasonable potential to cause, or contribute to an excursion above any state water quality standard.” Therefore the reasonable potential analysis should have been completed for all parameters with applicable Water Quality Standards and data to conduct the analysis, not only priority pollutants shown in table F-10. For example, the fact sheet should include the reasonable potential calculations for every parameter included in the limits table on page 5 of the permit for which there is a standard (i.e. not flow), as well as all parameters for which data are shown to be available (entries in fact sheet table F-2). The fact sheet should describe the reasonable potential analysis for all parameters which were considered, even parameters for which the conclusion was that effluent limits are not needed.	<p>The draft NPDES/WDRs do contain a reasonable potential analysis (RPA) for all pollutants for which there are water quality-based effluent limitations (WQBELs) in the permit. Table F-10 is located in a section that exclusively discusses the RPA for <u>priority</u> pollutants. The RPA analysis for <u>non-priority</u> pollutants is found in a different section – Section IV.C.5 of Attachment F. Separate sections discussing the RPA for these different types of pollutants (priority v. non-priority) is appropriate, and therefore staff does not recommend reorganizing the WDRs in response to this comment.</p> <p>However, for clarity, staff recommends adding the following to the heading for Table F-10:</p> <p style="padding-left: 40px;">“Table F-10 Summary of Reasonable Potential Analysis <u>for Priority Pollutants</u>”</p> <p>Staff also proposes adding several sentences to (1) Attachment F, Section IV.C.5.b, Oil and Grease and Floating Material and (2) Attachment F, Section IV.C.5.c, Chlorine to further explain the rationale and methodologies used in conducting the RPA for those pollutants. The added sentences can be found in the errata sheet (Nos. 3 and 4).</p> <p>These changes are reflected in the 4/9/19 errata sheet for the tentative WDRs.</p>